

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA)

v.)

Rajanishkumar PRAJAPATI,)
Manishkumar PATEL, Chirackumar)
PATEL, and Hiteshkaumar CHAUDNRI,)

Defendants.)

Case No. 8:23-mj-00035 (ATB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of January 12, 2023, in the county of Franklin in the Northern District of New York the defendants violated:

Code Section

8 U.S.C. § 1325 (a)(2)

Offense Description

The defendants, aliens and citizens of India, unlawfully eluded examination and inspection by Immigration officials.

This criminal complaint is based on these facts:

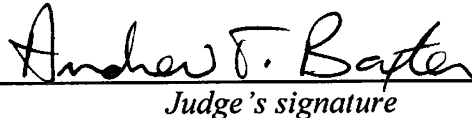
☒ Continued on the attached sheet.


Complainant's signature

Border Patrol Agent Richard Raymonda

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: January 17, 2023

*Judge's signature*City and State: Syracuse, New York

Hon. Andrew T. Baxter, U.S. Magistrate Judge

Printed name and title

This criminal complaint is based on these facts:

On January 13, 2023, at approximately 7:31 a.m., United States Border Patrol agents (USBP) were contacted by a concerned citizen that four subjects appearing to be from India had entered a white four door Honda Accord across from the Great View Motel in Fort Covington, New York. The Great View Motel has been a known meeting point for individuals who had just illegally entered the United States awaiting to arrange transportation to further their travel into the United States. Marked Border Patrol Agents responded and conducted a vehicle stop of the white Honda, registered to and being operated by Parth PATEL, an Indian national, with Lawful Permanent Resident status in the United States.

The passengers in the vehicle were identified as Rajanishkumar PRAJAPATI, Manishkumar PATEL, Chirackumar PATEL, and Hiteshkaumar CHAUDNRI.

None of the passengers had documentation that allowed them to legally be in or enter the United States and were all determined to be citizens and nationals of India with no legal status in the United States. The driver and the four passengers were transported to the Massena Border Patrol Station for further processing and investigation, along with the vehicle and its contents.

At the station, record checks were run through Swanton Sector Communications and revealed that R. PRJAPATI, M. PATEL, C. PATEL and H. CHAUDNRI, had no valid entries into the U.S. and none of the subjects had been admitted or paroled into the U.S. through a valid Port of Entry (POE). During questioning, the four Indian Nationals admitted to crossing the border into the United States illegally by walking across the border along railroad tracks near Burns Holden Road entering the town of Fort Covington near Center Street. Buckeye images of four subjects were captured the evening of January 12, 2023, at approximately 6:35 p.m. at the same location.